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February 28, 1997

EPA Region 5 Records Ctr.



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Kevin J. Hopper Co., LPA
Southampton Square
On behalf of: John Whitton Trucking Co.
7420 Jager Court
Cincinnati, OH 45230

SKINNER LANDFILL SUPERFUND SITE

Dear Mr. Hopper:

This firm represents a group of companies, including The Dow Chemical Company, Ford Motor Company, GE Aircraft Engines, Morton International, PPG Industries, Inc., and Velsicol Chemical Corporation (hereinafter "the Group"), in an action to be filed on their behalf in March 1997 in the United States District Court for the Southern District of Ohio. The Group consists of companies that have incurred response costs associated with the Skinner Landfill in West Chester, Ohio ("the Site") and are parties to a Unilateral Administrative Order and Consent Order with the United States Environmental Protection Agency ("EPA") regarding certain activities at the Site. The Complaint will seek from you and a number of other defendants recovery of costs incurred and to be incurred by the Group.

Most of the defendants have already received some background information about the Skinner Landfill from EPA. Upon information and belief, the Site was used for waste disposal from the 1930s until the late 1980s. The Site was operated as a family-owned business from the time the Skinners purchased the property (in or around 1947). All members of the Skinner family that worked at the Site have been deposed or interviewed regarding operations of the landfill and identification of PRPs. In addition, Elsa Skinner, who maintained the accounting records for the Skinner business for the entire time it was in operation, provided an accounting ledger spanning the period 1955 to 1987.

Many parties have already received nexus data that describe the evidence allegedly tying them to the Site. Enclosed with this letter is an additional package referencing your alleged nexus to the Site. This information was obtained through the efforts of EPA and the Group. EPA conducted a Responsible Party Search, took several administrative depositions and conducted several witness

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interviews, and obtained responses to Section 104(e) requests for information from a number of PRPs. The Group hired an investigator to identify additional PRPs and to interview individuals with knowledge of the Site and its customers during the years of operation.^{1/}

As we mentioned above, the Group intends to file its Complaint in March, but will temporarily refrain from serving the Complaint on you in the hope that the parties can reach consensus on an Alternative Dispute Resolution ("ADR") process to be conducted in lieu of traditional litigation. We believe that this approach is more equitable and cost effective for all the parties concerned. As you know, EPA has already endorsed such an approach in this case to bring about an allocation that is fair, reasonable, and acceptable to the parties.

As you know, there is a meeting scheduled for March 11, 1997 in Cincinnati to discuss these and other issues. We will provide to you shortly before or at that meeting a model ADR protocol that we would like to use as a starting point for developing a consensual ADR process. The Group wants to stress that you and your client will have input on the type of allocation process that will be most effective for this particular Site. We anticipate using the next month to entertain comments on the ADR procedure and to develop an acceptable ADR process.

We encourage you to attend the March 11th meeting. If you have any questions before then, please feel free to call me at (202) 789-6019, Fred Wagner of my office at (202) 789-6041, or Michael Kay at (517) 636-7872.

Sincerely yours,

Karl S. Bourdeau

On Behalf of: The Dow Chemical Company,
Ford Motor Company, GE Aircraft Engines
Morton International, PPG Industries, Inc.
Velsicol Chemical Corporation

Enclosures

^{1/} At the request of EPA, the nexus materials have been redacted in an initial effort to protect the privacy of non-Skinner family member witnesses. We anticipate that full, unredacted versions of the nexus materials will be provided to cooperating PRPs during the course of the ADR proceedings.

Skinner Accounting Log Entry Summaries

May 1994

SKINNER LANDFILL PRPS

ADDRESS

		1955	1956	1957	1958	1959	1960	1961	1962	1963	1964
		Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping On	Dumping
										U. Chester	On Arlington
										Property	Hgts & West
											Chester Prop
A.R. BAKER	Maud, OH		\$2.00								
ACME WRECKING	820 Mehrman Ave; Cin 29, OH										
AERONEA MFG CO	Midlandtown, OH		\$21.00							\$45.00	
ALDEN LANDSCAPING	Cincinnati, OH										
AMERICAN BARREL AND COOPERAGE CO	1250 Knowlton St; Cincinnati 21, OH	\$25.00			\$150.00						
AMERICAN CYANAMID CO.	Box 41316; Cin, OH 45241										
ANTHONY L. RACH EXCAVATING CONTN	520 Davis St; Lockland, Cin 15 OH										\$25.00
ARMCO SYSTEMS CONTRACTING	10300 Evendale Dr; Cin, OH 45241										
ARTHUR RADKIN	Cincinnati, OH	\$29.00									
AVON PRODUCTS	175 Progress Place; Springdale, Cin, OH 45246										
B & B WRECKING AND EXCAVATING	5801 Train Ave; Cleveland, OH 44102										
B. ESTERKAMP	3747 Rickle Rd; Cincinnati 39, OH				\$87.50						
B.F. GOODRICH CO	500 S. Main St; Akron, OH 44318										
BEATTY'S AUCTION	West Chester, OH										
BERMAN LEASING CO	High and Berk St; Pottstown, PA 19464										
BILL RING	Bethany, OH	\$1.50									
BILL YOUNG & CO, INC	Box 15012; 1843 N. Reading Rd; Cin, OH 45215										
BOLES DIESEL EXCAVATING	Kemper Rd at Crooms Rd; Cin, OH										
BOB HOWARD	West Chester, OH		\$4.50								
BOB PIERALLI EXCAVATING	Kemper Rd. at Crooms Rd.; Cin, OH										
BRASHEAR CONSTRUCTION, INC	2520 Millville-Ross Rd; Hamilton, OH 45013										
BUTLER COUNTY	Hamilton, OH										
BUTLER MFG CO.	1217 Ellis St.; Cin, OH 45223										
BYRNES AND CONWAY CO.	50 Oak St.; Cinn., St. Bernard, OH		\$13.50								
C. DATTILO AND COMPANY	Hamilton, OH										
C.L. HOPKINS AND SONS	2451 Webster Pike; Cin 27 OH	\$8.00	\$146.00	\$1,020.00	\$30.00	\$900.00		\$60.00		\$1,535.00	\$6,188.00
C.M. PAULA CO	773 School Rd; Cin, OH 45242										
CARL HUFF	Cincinnati, OH										\$12.00
CARL MILLEN	Bethany, OH		\$12.00								
CANDLER CONST. CO.	8818 Le Soudesville-West Chester Rd; West Chest										
CHEMICAL LEAMAN TANK LINES, INC	Box 128; Ross, OH 45061										
CHURCH OF CHRIST	West Chester, OH 45069										
CIN. PAVING AND SEALING	Cincinnati, OH										
CINCINNATI CLG. AND FINISHING CO	Cincinnati 2, OH	\$24.00	\$82.00								
CINCINNATI MILACRON CHEMICALS	Cincinnati, OH 45215										
CITY OF DEER PARK	Hamilton Co, OH			\$214.00	\$62.00	\$116.20	\$142.00				
CITY OF LINCOLN HEIGHTS	9401 N Wayne Ave; Cin, OH 45215										

SKINNER LANDFILL PRPS[illegible]

May 1994

SKINNER LANDFILL PRPS

	1979	1980	1981	1982	1983	1984	1985	1986	1987	TOTAL	Z
	Trucking, Hauling & Etc	Trucking, Hauling & Etc	Trucking, Hauling Etc	Dumping Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Landfill		
A.R. BAKER										\$2.00	0.00081
ACME WRECKING										\$912.00	0.34742
AERONEA MFG CO										\$426.00	0.16232
ALDEN LANDSCAPING							\$125.00			\$125.00	0.04762
AMERICAN BARREL AND COOPERAGE										\$175.00	0.06672
AMERICAN CYANAMID CO.										\$50.00	0.01901
ANTHONY L. RACH EXCAVATING CON										\$1,815.00	0.69152
ARMCO SYSTEMS CONTRACTING	\$660.00									\$660.00	0.25142
ARTHUR RABKIN										\$29.00	0.01102
AVON PRODUCTS										\$100.00	0.03812
B & B WRECKING AND EXCAVATING										\$0.00	0.00002
B. ESTERKAMP										\$87.50	0.03332
B.F. GOODRICH CO										\$350.00	0.13332
BEATY'S AUCTION					\$540.00					\$540.00	0.20572
BERMAN LEASING CO										\$0.00	0.00002
BILL RING										\$1.50	0.00062
BILL YOUNG & CO, INC										\$2,225.96	0.84802
BOLES DIESEL EXCAVATING										\$125.00	0.04762
BOB HOWARD										\$4.50	0.00172
BOB PIERALL EXCAVATING										\$0.00	0.00002
BRASHEAR CONSTRUCTION, INC	\$710.00									\$930.00	0.35432
BUTLER COUNTY										\$50.00	0.01902
BUTLER MFG CO.										\$56.00	0.02132
BYRNES AND CONWAY CO.										\$13.50	0.00512
C. DATILO AND COMPANY										\$0.00	0.00002
C.L. HOPKINS AND SONS										\$17,352.00	6.61062
C.M. PAULA CO										\$306.00	0.19282
CARL HUFF										\$12.00	0.00462
CARL MILLEN										\$12.00	0.00462
CHANDLER CONST. CO.					\$965.76					\$965.76	0.36792
CHEMICAL LEAMAN TANK LINES, IN										\$436.00	0.16612
CHURCH OF CHRIST										\$1,000.00	0.38102
CIN. PAVING AND SEALING							\$30.00			\$30.00	0.01142
CINCINNATI CLG. AND FINISHING										\$106.00	0.04042
CINCINNATI MILACRON CHEMICALS										\$3,050.00	1.16202
CITY OF DEER PARK										\$534.20	0.20352
CITY OF LINCOLN HEIGHTS										\$2,205.00	0.84002

SKINNER LANDFILL. PRPS

SKINNER LANDFILL. PRPS

[illegible]

SKINNER LANDFILL PRPS[illegible]

SKINNER LANDFILL PAPS[illegible]

SKINNER LANDFILL PRPS

HAMILTON WEST APTS. (Mc. JB RogeBox "C" Woodlawn; Cln 31, OH	
MARGENAM ENTERPRISES CONST	Box 41512; Sharonville, OH 45241
HAWE'S GARBAGE AND TRASH	11673 N. Walnut St.; Cln 46, OH
JACK HAWKS WASTE COLLECTION	Box # 44; Miamiaville, OH 45157
HEINZE EXCAVATING	Cincinnati, OH
HOCKES DINCH CO.	Cincinnati, OH
HOWARD GOSSAGE	Ruthany, OH
HUBER AND WICKE	West Chester, OH
HUB REALTY	309 Elm St.; Cln, OH 45202
INDUSTRIAL EQUIPMENT AND SUPPLY	540 Walnut St; Hamilton, OH
INTERNATIONAL MINERAL AND CHEMICALS	Box 4 and Swalley Rd; Sharonville, Cln 45241
J. WEBER DAIRY CO.	Hamilton and Cincinnati, OH
J.P. CONSTRUCTION	Box 496; Goshen, OH 45122
JAMES GILLIS, CONTRACTOR	Cincinnati, OH
JOHN F. BUSHELMAN CONST	Sharonville, OH
JOHN J. WHITTON TRUCKING	Cincinnati, OH
JOHN LUNSFORD-SHARON CAR WASH	11167 Main St; Cln 41, OH 45241
JOHN R. LOOMIS, INC	Box 36167; Cln, OH 45236
KELLEY AND CARPENTER	230 S. Fifth St; Hamilton, OH 45011
KROGER CO, FOOD PROCESSING	1249 State Ave; Cln, OH 45204
KING WRECKING CO/Container Serv	1441 Gast St.; Cln OH 45203
KUNZ	Reading, OH
L.D. WAGNER	24 Lady Lane; Reading, Cln, OH 45215
L.R. BROOK	Cincinnati, OH
L.V.M., INC.	Cincinnati, OH
LACROUX PRODUCTS, INC.	400 E. State St; Trenton, OH 45067
LARY SANDERS	10556 Wycarver Rd; Cln 41, OH
LASONITE FABRICATORS	10360 Evendale Dr; Cln, OH 45241
LECCO, INC (Leslie Townsend)	Middletown, OH
MELDY BRANCH PRODUCTS (Wm. Depo)	7965 Cln-Dayton Rd; Maud, Ohio
MICHAEL LICHTENBERG CONST	Cincinnati, OH
MID AMERICAN WASTE	Cincinnati, OH
MIDDLETON BROTHERS	Mason, OH
MISCELLANEOUS	
MULTI COLORTYPE CO	4575 Eastern Ave; Cln, OH 45226
MURPHY CONSTRUCTION CO	10080 Windwath Rd; West Chester, OH 45069
NORMAN LUNSFORD	2164 Ohio Pike; R.R.2; Batavia, OH 45069
ORTHLOVE	

SKINNER LANDFILL PRPS[illegible]

May 1994

SKINNER LANDFILL PRPS

	1979	1980	1981	1982	1983	1984	1985	1986	1987	TOTAL	Z
	Trucking, Hauling & Etc	Trucking, Hauling & Etc	Trucking, Hauling & Etc	Dumping At Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Landfill		
HAMILTON WEST APTS. (Mr. JB R.)										\$90.00	0.03432
MARGENAN ENTERPRISES CONST										\$780.00	0.29722
HAUK'S GARBAGE AND TRASH										\$204.00	0.07772
JACK BAKES WASTE COLLECTION										\$12,379.71	4.71632
HEINZE EXCAVATING		\$210.00								\$210.00	0.08002
HOCKS BINCH CO.										\$14.50	0.00552
HOWARD GOSSAGE										\$1.50	0.00062
HUBER AND WICKE										\$7.00	0.00272
HWB REALTY										\$0.00	0.00002
INDUSTRIAL EQUIPMENT AND SUPPL										\$0.00	0.00002
INTERNATIONAL MINERAL AND CREM										\$0.00	0.00002
J. WEBER DAIRY CO.										\$405.00	0.15432
J.P. CONSTRUCTION	\$150.00									\$150.00	0.05712
JAMES GILLIS, CONTRACTOR						\$2,799.00				\$2,799.00	1.06632
JOHN F. BUSHELMAN CONST						\$305.00				\$1,945.00	0.74102
JOHN J. WHITTON TRUCKING							\$775.00		\$5,000.00	\$5,775.00	2.20012
JOHN LUNSFORD-SHARON CAR WASH										\$12.00	0.00462
JOHN R. LOOMIS, INC										\$4,062.00	1.54752
KELLEY AND CARPENTER										\$0.00	0.00002
KROGER CO, FOOD PROCESSING										\$925.00	0.35242
KING WRECKING CO/Container Ser						\$1,250.00	\$760.00	\$16,280.00	\$18,050.00	\$38,120.00	14.52262
KUNZ										\$2.00	0.00002
M.D. HAGNER										\$1,535.04	0.58482
M.B. BROOK										\$26.50	0.01012
M.V.M., INC.						\$875.00	\$795.00		\$825.00	\$2,495.00	0.95052
MAGNODE PRODUCTS, INC.	\$935.00									\$935.00	0.35622
MARY SANDERS										\$3,354.00	12.70692
MASONITE FABRICATORS										\$2,716.00	1.05472
MECO, INC (Leslie Townsend)										\$994.00	0.37872
MELDY BRANCH PRODUCTS (Wm. W.)										\$0.00	0.00002
MICHAEL LICHTENBERG CONST							\$120.00			\$120.00	0.04572
MO AMERICAN WASTE									\$3,925.00	\$3,925.00	1.49532
MOULETON BROTHERS										\$16.50	0.00632
MISCELLANEOUS				\$510.00		\$720.00	\$320.00	\$2,753.00	\$3,821.00	\$10,823.50	4.12342
MULTI COLORTYPE CO										\$312.00	0.11892
MURPHY CONSTRUCTION CO	\$1,127.00									\$1,764.00	0.67202
MURPHY LUNSFORD										\$10.00	0.00382
MURPHY									\$2,925.00	\$2,925.00	1.11432

SKINNER LANDELL PRPS

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PERKINS CONSTRUCTION GENERAL CONT1010 Summer St; Cln, OH 43204

[illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible]

1. C. LINTHICUM AND SPINIFOLIA	1994-1995	1995-1996	1996-1997	1997-1998	1998-1999	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032	2032-2033	2033-2034	2034-2035	2035-2036	2036-2037	2037-2038	2038-2039	2039-2040	2040-2041	2041-2042	2042-2043	2043-2044	2044-2045	2045-2046	2046-2047	2047-2048	2048-2049	2049-2050	2050-2051	2051-2052	2052-2053	2053-2054	2054-2055	2055-2056	2056-2057	2057-2058	2058-2059	2059-2060	2060-2061	2061-2062	2062-2063	2063-2064	2064-2065	2065-2066	2066-2067	2067-2068	2068-2069	2069-2070	2070-2071	2071-2072	2072-2073	2073-2074	2074-2075	2075-2076	2076-2077	2077-2078	2078-2079	2079-2080	2080-2081	2081-2082	2082-2083	2083-2084	2084-2085	2085-2086	2086-2087	2087-2088	2088-2089	2089-2090	2090-2091	2091-2092	2092-2093	2093-2094	2094-2095	2095-2096	2096-2097	2097-2098	2098-2099	2099-2100	2100-2101	2101-2102	2102-2103	2103-2104	2104-2105	2105-2106	2106-2107	2107-2108	2108-2109	2109-2110	2110-2111	2111-2112	2112-2113	2113-2114	2114-2115	2115-2116	2116-2117	2117-2118	2118-2119	2119-2120	2120-2121	2121-2122	2122-2123	2123-2124	2124-2125	2125-2126	2126-2127	2127-2128	2128-2129	2129-2130	2130-2131	2131-2132	2132-2133	2133-2134	2134-2135	2135-2136	2136-2137	2137-2138	2138-2139	2139-2140	2140-2141	2141-2142	2142-2143	2143-2144	2144-2145	2145-2146	2146-2147	2147-2148	2148-2149	2149-2150	2150-2151	2151-2152	2152-2153	2153-2154	2154-2155	2155-2156	2156-2157	2157-2158	2158-2159	2159-2160	2160-2161	2161-2162	2162-2163	2163-2164	2164-2165	2165-2166	2166-2167	2167-2168	2168-2169	2169-2170	2170-2171	2171-2172	2172-2173	2173-2174	2174-2175	2175-2176	2176-2177	2177-2178	2178-2179	2179-2180	2180-2181	2181-2182	2182-2183	2183-2184	2184-2185	2185-2186	2186-2187	2187-2188	2188-2189	2189-2190	2190-2191	2191-2192	2192-2193	2193-2194	2194-2195	2195-2196	2196-2197	2197-2198	2198-2199	2199-2200	2200-2201	2201-2202	2202-2203	2203-2204	2204-2205	2205-2206	2206-2207	2207-2208	2208-2209	2209-2210	2210-2211	2211-2212	2212-2213	2213-2214	2214-2215	2215-2216	2216-2217	2217-2218	2218-2219	2219-2220	2220-2221	2221-2222	2222-2223	2223-2224	2224-2225	2225-2226	2226-2227	2227-2228	2228-2229	2229-2230	2230-2231	2231-2232	2232-2233	2233-2234	2234-2235	2235-2236	2236-2237	2237-2238	2238-2239	2239-2240	2240-2241	2241-2242	2242-2243	2243-2244	2244-2245	2245-2246	2246-2247	2247-2248	2248-2249	2249-2250	2250-2251	2251-2252	2252-2253	2253-2254	2254-2255	2255-2256	2256-2257	2257-2258	2258-2259	2259-2260	2260-2261	2261-2262	2262-2263	2263-2264	2264-2265
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PADE CONTENTIAL EXPRESS, INC West Sec., Bldg, Cin 15, OH

[illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible]

U.S. INFORMATION AGENCY Bethany Relay Station; VOA Box 222; Mason, OH 45|| || || || || || || || || ||

IVERSAL CONTRACTING CORP 5706 Carthage Ave, Cln, OH 45212 || || || || || || || || || || || || || || ||

[illegible][illegible][illegible]

NAME OF CLERK	CLERK'S RESIDENCE	CLERK'S OFFICE	CLERK'S PHONE	CLERK'S FAX	CLERK'S E-MAIL	CLERK'S WEBSITE	CLERK'S ADDRESS	CLERK'S CITY	CLERK'S STATE	CLERK'S ZIP	CLERK'S COUNTRY	CLERK'S PHONE	CLERK'S FAX	CLERK'S E-MAIL	CLERK'S WEBSITE	CLERK'S ADDRESS	CLERK'S CITY	CLERK'S STATE	CLERK'S ZIP	CLERK'S COUNTRY
CLERK OF COURTS	CLERK'S RESIDENCE	CLERK'S OFFICE	CLERK'S PHONE	CLERK'S FAX	CLERK'S E-MAIL	CLERK'S WEBSITE	CLERK'S ADDRESS	CLERK'S CITY	CLERK'S STATE	CLERK'S ZIP	CLERK'S COUNTRY	CLERK'S PHONE	CLERK'S FAX	CLERK'S E-MAIL	CLERK'S WEBSITE	CLERK'S ADDRESS	CLERK'S CITY	CLERK'S STATE	CLERK'S ZIP	CLERK'S COUNTRY

[illegible][illegible][illegible][illegible]

SKINNER LANDFILL PRPS[illegible]

SKINNER LANDFILL. PRPS

May 1994	1979	1980	1981	1982	1983	1984	1985	1986	1987	TOTAL	Z
SPINNER LANDFILL PRPS	Trucking, Hauling & Etc	Trucking, Hauling & Etc	Trucking, Hauling Etc	Dumping	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Landfill		
NW PAVING CO.						\$150.00				\$150.00	0.05712
O'Rourke Construction Co										\$230.00	0.08762
OSBORNE TRUCKING CO										\$0.00	0.00002
PAUL CAVIN										\$5.00	0.00192
PAYLESS DISCOUNT FOODS										\$48.00	0.01832
PENKER CONSTRUCTION GENERAL CO										\$3.00	0.00112
PETRIKOFF'S (ORUM)										\$0.00	0.00002
PHILIP W. SCHMIDT										\$12.00	0.00462
PIERRE W. MATHER										\$0.00	0.00002
POST OFFICE JOB					\$1,393.42					\$1,393.42	0.53092
PROGRESSIVE DAYWALL	\$164.00									\$164.00	0.06252
QUEEN CITY R.R. CONST, INC										\$2,330.00	0.88772
R.W. MURRAY CO.							\$3,080.00			\$3,080.00	1.17342
RALSTON PURINA CO.										\$156.00	0.05942
RAY V. MOYERS										\$6.50	0.00252
RUMPKA										\$18.00	0.00692
S.G. LOWENDICH AND SONS										\$200.00	0.07622
SCHMIDT-DHARROW CO FUNERAL DIR										\$35.00	0.01332
SERVICE TRANSPORT										\$37.00	0.01412
SPADE CONTINENTAL EXPRESS, INC										\$0.00	0.00002
SPRAY-DYNE CORPORATION										\$1,300.00	0.49532
ST JOE PAPER CO.										\$235.00	0.08952
STEELMAN WRECKING AND CONST.	\$300.00					\$500.00				\$800.00	0.30482
STEVENS, JOHN B.										\$35.00	0.01332
STILLGRASS TRANSIT CO. INC.										\$300.00	0.11432
STUPINGER DEMOLITION SALES AND										\$0.00	0.00002
THOMAS B. KEYES GENERAL CONT					\$20.00					\$20.00	0.00762
TRAMPLER BROTHERS										\$6.00	0.00232
TRI-COUNTY ROOFING CO.							\$15.00			\$15.00	0.00572
U.S. INFORMATION AGENCY										\$175.00	0.06672
UNIVERSAL CONTRACTING CORP			\$460.00							\$460.00	0.17522
VAUGHN BUILDING CO OF OHIO										\$839.25	0.31972
VEST AND BORTELL										\$71.00	0.02702
VILLAGE OF GLENDALE(Glendale W										\$1,950.00	0.74292
VILLAGE OF MONROE										\$3,009.00	1.14632
VILLAGE OF MONTGOMERY										\$62.50	0.02382
VILLAGE OF SILVERTON										\$48.00	0.01822
WAVE EXCAVATING	\$150.00									\$150.00	0.05712

May 1994

SKINNER LANDFILL PRPS

ADDRESS

W.K. HOWARD Bethany, OH
 WALTER CORDEN
 WEST CHESTER EXCAVATING West Chester, OH
 WHITEVOCK'S Cincinnati, OH
 WILLIAMSBURG HOME
 WILLIAMSBURG PROPERTIES, INC. Cincinnati, OH
 ZILLIG EXCAVATING AND PAVING Cincinnati, OH

1955	1956	1957	1958	1959	1960	1961	1962	1963	1964
Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping	Dumping On	Dumping
								W. Chester	On Arlington
								Property	Hgts & West
									Chester Prop
\$1.00									
\$10.00									
\$21.00									

TOTAL

\$618.00 \$825.50 \$1,344.50 \$1,379.50 \$3,278.20 \$2,000.00 \$1,147.00 \$1,131.50 \$8,042.00 \$25,939.50

May 1994
SKINNER LANDFILL PRPS

W.K. HOWARD
WALTER CORDEN
WEST CHESTER EXCAVATING
WHITEVOOK'S
WILLIAMSBURG HOME
WILLIAMSBURG PROPERTIES, INC.
ZILLIG EXCAVATING AND PAVING

	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978
Dumping	Dumping	Dumping--	Dumping On	Trucking,	Trucking,	Trucking	Demolition	Trucking,	Trucking,	Trucking,	Trucking,	Trucking,	Trucking,	Trucking,
	On West	Landfill &	Landfill	Hauling,	Hauling,	Hauling	Work & Misc	Hauling	Hauling &	Hauling &	Hauling &	Hauling &	Hauling &	Hauling &
	Chester	Disposal	Disposal	Etc.	Etc.	& Etc.	Wrecking	Etc	Etc to Dump	Etc to Dump	Etc	Etc	Etc	Etc
	Property	Plant	Plant											
W.K. HOWARD														
WALTER CORDEN														
WEST CHESTER EXCAVATING														
WHITEVOOK'S														
WILLIAMSBURG HOME														
WILLIAMSBURG PROPERTIES, INC.														
ZILLIG EXCAVATING AND PAVING														
	\$25,248.10	\$21,872.76	\$34,258.02	\$4,980.74	\$1,330.25	\$2,430.00	\$3,913.00	\$1,000.00	\$1,500.00	\$5,007.78	\$3,380.00	\$5,583.00	\$2,106.00	\$2,526.00

May 1994
SKINNER LANDFILL PRPS

	1979	1980	1981	1982	1983	1984	1985	1986	1987	TOTAL	Z
Trucking, Hauling & Etc	Trucking, Hauling & Etc	Trucking, Hauling & Etc	Dumping	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Disposal Plant	Dumping At Landfill		
W.K. HOWARD										\$1.00	0.00042
WALTER CORDEN										\$10.00	0.00382
WEST CHESTER EXCAVATING									\$3,870.00	\$3,870.00	1.47442
WRITEVOCK'S										\$21.00	0.00802
WILLIAMSBURG HOME									\$4,600.00	\$4,600.00	1.75252
WILLIAMSBURG PROPERTIES, INC.							\$225.00			\$225.00	0.08372
ZILLIG EXCAVATING AND PAVING		\$540.00			\$100.00					\$640.00	0.24382
	\$4,456.00	\$1,200.00	\$680.00	\$510.00	\$4,494.18	\$6,884.00	\$7,275.00	\$22,506.00	\$51,641.00	\$262,487.53	

Former Skinner Site
Resident Interview
Excerpts

CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview,

On March 19, 1993

Orion Management International (OMI) had been retained to reconstruct the events and use of an area known as the Skinner Landfill.

who is employed with [redacted] in [redacted] extension [redacted], is 30 years of age and lived with [redacted] at the site from 1986 through 1988.

He advised that he stripped salvaged parts and stored them on the Skinner property for resale and worked on equipment in exchange for a place to live. He was also responsible, approximately two to three times per week, for walking the dump and making sure haulers did not dump anything at the site they were not supposed to. [redacted] instructed him that haulers were only to dump demolition material and not take anything other than that.

Individuals he could recall at the site were Ray Skinner and an individual he referred to as "Scotty", who worked on machinery, but was not at the dump site. He stated Scotty was in his late 40's or 50's, and he had no idea of where this individual could be reached. He also recalled at the site extensively.

stated that Elsa Skinner-Morgan's husband, David Morgan, would occasionally check trucks going into the dump by conversing with the drivers and looking into the top of the trucks to see what it contained. [NOTE: David Morgan has previously denied any activity or involvement with the dump in any way].

King Container utilized the site more than anyone else. He stated they would have approximately five to ten trucks per day, with 30 to 40 yard containers, and sometimes larger, hauling primarily demolition debris. Occasionally, **King Container** and the other hauling companies, **Rumpke, Clarke and Whitton**, brought in 55-gallon drums underneath the construction debris. He stated some

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who is employed with [redacted] in [redacted], extension [redacted], is 30 years of age and lived with [redacted] at the site from 1986 through 1988.

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of the drums were empty, however, some were full and he did not know what was in the drums.

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CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview,

stated that on days he worked on machinery, he would observe **King, Rumpke, Clarke and Whitton** travel up to the dump site unsupervised. Once they left, he would go on site and note drums and other items, such as plastic bags, filled with "unknown" material, in and around the construction debris.

He identified a hauling company known as **Lilly's** (phonetic), which handled metal, rock, and basic demolition debris, in 30-yard containers. He was not certain where the company was located.

He also stated there was a small company in Bethany, Ohio, that brought in drywall on flat bed trucks.

[NOTE: had identified as the individual who would be most knowledgeable of truck drivers who worked for various hauling companies]. advised that he usually did not converse with the drivers, as he was "somewhat of a shy individual". He added that had the most contact with the drivers and often conversed with them.

Rumpke Hauling Company operated brown trucks and brought in scrap iron, and on occasion, a couple of barrels. He stated that when they did bring in barrels, they would be in and out in a hurry. **Rumpke** had three to four trucks at a time at the dump, on an average of once or twice a week. But, then on other occasions he would not see them for a month.

Clarke Container was at the site daily with 30 to 40 yard containers of demolition debris from torn down sites. **Clarke** would have six to ten trucks at the site emptying debris every day.

Whitton Hauling utilized the site as often as **Clarke Container**, with two to five trucks per day.

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Ray Skinner Interview Excerpts

CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview, Ray Skinner:

On March 5, 9, 10 and 14, 1993, Ray Skinner,
was interviewed.

After being advised that Orion Management International (OMI) had been retained to reconstruct the events and use of an area known as the Skinner Landfill, he provided the following information.

Skinner is approximately 50 years of age and is unable to read and write. As a child, he used to roam the site with his father, Albert Skinner. He entered the military shortly after high school and subsequently worked for the New York, Conrail and Penn Central Railroad System for 17 years.

He has resided on the Skinner property for the majority of his life, and started working the landfill exclusively during the mid-to-late 1980's after his brother, John, and their father had died.

Skinner advised that the dump site and the surrounding property had been in his family since the 1930's, and was initially a sand and gravel pit. His father began using the site as a dump in the 1950's, although area residents were permitted to openly dump their refuse at the site, prior to that time.

The site was operated exclusively by his father until the mid-to-late 1960's, at which time, John Skinner assisted his then semi-retired father. John Skinner ran the site until his death in the early 1980's.

Maria Skinner, Ray's sister, who also lives on the site, ran the dump for a short period of time until Ray took it over. Skinner advised that his mother handled the financials for the business and rarely, if ever, was on the dump itself.

Skinner stated that [redacted] also lived on the site and assisted Albert and John Skinner. He advised that [redacted] was "scared off" by the EPA and left the area.

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CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview, Ray Skinner (cont):

After the site was closed, Skinner advised that he hauled thousands of barrels, that were on and around the property, out of the area to a junk yard in Cincinnati. He stated that the majority of the barrels were placed on the site by **Champion Paper** and "newspaper companies", subsequently identified as the **Cincinnati Enquirer**.

He stated that these entities were also responsible for chemicals on the site, although he was unable to identify which chemicals, or how they were brought into the site and by whom.

Skinner advised that John Skinner dealt exclusively with **Chem-Dyne**, and he had no knowledge of their activities, other than to acknowledge they were on the site.

John Skinner hauled for numerous companies, primarily referring to demolition debris which was brought into the site. He was not certain which companies and stated there was no paperwork or contracts affiliated with these transactions.

The dump was operated basically on an "honor system", where haulers were permitted to go on site, primarily without the supervision of the Skinner family. They would advise the Skinner's of the amount dumped, referring to size of containers. He stated that he may have copies of driver's tickets, which were used for billing purposes, in storage somewhere on the property. He advised that he would attempt to locate them.

Skinner identified the following PRPs:

- Ford Motor Company, Sharonville
- General Electric, Evendale
- Leggatt Plat, Mason, Ohio (pallet company)
- Stearns & Foster's, Reading, Ohio
- Champion Paper, Cincinnati/Dayton
- Hilton Davis (chemical plant behind the Cincinnati Gardens)
- Chem-Dyne

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Herbert Chemical
Planes Moving and Storage
Rowe Excavating

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CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview, Ray Skinner (cont):

Whitton Hauling
Mid-Atlantic
Avon
Coca-Cola
Pepsi
Dick and Marty Clarke
King Container (formerly King Wrecking)
CDI, Cleveland (operated by Joe Potter, who hauled
demolition debris from Wright Patterson Air Force Base)
Leslie Townsley
Metco, Middletown, Ohio (possibly Mecco)
Gillis Construction, Reading, Ohio (owned by Jim Gillis)
Don McKarrow (owner of a large construction company)
Dick Jones, Cincinnati
Rowe Excavating
King Powder Company
Kings Mills
Frank Adams Scrap Company
American Laundry
Formica
Cincinnati Drum
Champion Paper
Cincinnati Enquirer
New York Central Railroad
Queen City Railroad
Tri-County Mall
Castonelli Square
City of Sharonville
City of Evendale
City of Blue Ash
Fisher Body, Norwood, Ohio
Lincoln Heights (Cincinnati suburb)
John Bushelman Construction
Moss Coen (junk yard operator in Cincinnati)
Ed Batey (owner of the construction company)
BFI
Ashley Ward Company
Union Schools

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CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview, Ray Skinner (cont):

Procter & Gamble
Durkee French Foods
Lo Mar, Sharonville
Trinity Industries (formerly known as Brighton)
Redding Rock (cement company)
Wright Patterson Air Force Base
Continental Mineral
Goodyear
Firestone
General Tire
Dave Estes Construction Company
Ralston-Purina
Tri-County Roofing
MVM Sales and Service
Trumbull Construction
Astro Containers
Delco Air
Thomas/Sysco Foods
Dow Chemical
Texaco
West Chester Post Office
Unidentified ink company (located next to Ohio Truck Parts)
Unidentified oil company (near Cincinnati Gardens)

Leggatt Plat

Previously identified by Skinner as "Liggen". He stated this company is located in Mason, Ohio and still in existence. This company hauled in wooden pallets on tractor trailer flat beds approximately once a week to once a month. He is not certain when they began using the Skinner site, but it was during the time he worked there exclusively, approximately 1986 through 1990.

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CONFIDENTIAL INVESTIGATIVE
MEMORANDUM

Interview, Ray Skinner (cont):

Skinner advised that after his brother and father died, he hauled numerous barrels from the landfill to a scrap yard in Cincinnati. These barrels contained tar, grease, oils and paint solvent believed to be from Fisher Body in Norwood, which is now a General Motors Plant.

He stated that he would be able to identify additional PRPs by driving around the City of Cincinnati. Because he did not exclusively work the site, he could not recall all names of places, but did have an idea of where refuse and debris originated.

Skinner explained one of the reasons he was not completely certain of what various companies dumped in the site, was because it was mainly operated by Albert and John Skinner. But, from living on the property, he recalled the various trucks previously identified as hauling into the dump.

The main hauling companies utilizing the site were **King Container, Clarke Container and Whitton Hauling**.

Although he knew several drivers by sight, the only one he knew by name was Bob Robertson, the son of Junior Robertson, who hauled for **Chem-Dyne**.

Skinner identified an individual he knew as "Rap", who was a driver for **Coca-Cola**, and was at the site extensively. He had no idea where this individual was, or his real name.

He also identified Bruce Whitton as utilizing the site. Bruce Whitton also hauled for **Chem-Dyne** [NOTE: Subsequent investigation indicated that Bruce Whitton was partners with William Kovacs as owners of Chem-Dyne].

He was unable to identify any additional drivers.

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Ray Skinner Deposition Excerpts

1
2
3 ENVIRONMENTAL PROTECTION AGENCY
4

5 IN THE MATTER OF:
6

7
8 SKINNER LANDFILL SUPERFUND SITE
9

10 Deposition of RAY SKINNER, a witness
11 herein, taken by the Environmental Protection
12 Agency as upon cross examination and pursuant to
13 the Applicable Rules of Civil Procedure as to the
14 time and place and stipulations hereinafter set
15 forth, at the offices of the U.S. Attorney, 100
16 East Fifth Street, Cincinnati, Ohio at 3:00 p.m..
17 on Monday, June 17, 1991, before Lorna J.
18 Bergemeier, a Court Reporter and notary public
19 within and for the State of Ohio.
20
21
22
23
24
25

.

1 APPEARANCES:

2 ON BEHALF OF THE ENVIRONMENTAL PROTECTION
3 AGENCY

4 Mr. John Breslin
5 Attorney at Law
6 U.S. Environmental Protection Agency
7 Office of Regional Counsel
8 230 Dearborn
9 5HSM-TUB7
10 Chicago, Illinois

11 ON BEHALF OF RAY SKINNER

12 Mr. Timothy R. Evans
13 Attorney at Law
14 Holbrock and Johnson
15 Holbrock and Johnson Building
16 Monument at Ludlow
17 Hamilton, Ohio

18 ALSO PRESENT

19 Mr. Paul J. Rogers, EPA Investigator

20

21 WHEREUPON:

22 RAY SKINNER,

23 of lawful age, a witness herein, being first duly
24 sworn as hereinafter certified, was examined and
25 deposed as follows:

26 CROSS EXAMINATION

27 BY MR. BRESLIN:

28 Q. Mr. Skinner, would you please state your
29 full name?

1 they went to Conrail, I believe they called it.

2 Q. Okay. What years, do you remember what
3 years you worked for the railroad and how long?

4 A. Gosh, I don't know. I think I hired out
5 in 1964.

6 Q. Okay.

7 A. And got drafted in the service I think in
8 1967.

9 Q. How long were you in the service?

10 A. Two years. Honorable discharge.

11 Q. Was that two separate terms, were -- you
12 actually went to Nam, didn't you?

13 A. I went overseas.

14 Q. So what, when you came back, when you
15 were discharged it was '69, then?

16 A. '68 or '69. I don't recall. See, I'm
17 not that good with dates.

18 Q. Okay. I'm just trying to, what I'm
19 trying to get at is a history of the site more or
20 less.

21 A. See, my brother and my dad done that and
22 I just never did work up there. And I just run
23 dozers and stuff and Dad got sick and my brother
24 died and my mom was just, had, you know, a lot of
25 doctor bills and expenses.

1 dump?

2 A. Yes. There was always somebody showed
3 them where to dump or they would have dumped all
4 over the place.

5 Q. So that would have been you out there.
6 Do you remember anybody else that
7 did that?

8 A. There was some, just people that come in
9 and help out. And there's, you know, and they
10 would leave boxes there and what we knowed wasn't
11 supposed to be there, they would haul it back off
12 the place. We would throw it back in the boxes.

13 And a lot of people who would save
14 paper would come in there and some people come in
15 there and save a lot of wood, like two-by-fours.
16 It was just people. I give it to them. They just
17 made a living off of it. And a lot of metal, you
18 know, you save that.

19 It's the only way I know how to make
20 a living. I just ain't that bright.

21 Q. So you were, you personally were
22 involved, then, in determining what kind of waste
23 was allowed to be dumped there and which stuff
24 would have to be taken back by the company or the
25 hauler?

1 A. There was several loads Mom turned away.

2 Q. Do you recall any of the names of any
3 companies which may have disposed of paints or oils
4 or any other kinds of sludges out there?

5 A. Not that I know truthfully. My mom took
6 care of all the books and, you know, the
7 paperwork. I don't know who got bills and what.
8 All I did was just make sure the dump was covered
9 up and that it didn't catch on fire.

10 Q. Would you cover it like on a daily basis
11 or a weekly basis or --

12 A. Sometimes it would take, you know, she
13 never got that much, two, three loads here and
14 there. And there were people sneaking in every
15 once in a while and we would catch them, in pickup
16 trucks and stuff. It has happened.

17 And I would usually cover it in the
18 evenings. Ninety percent of it was mostly dirt and
19 stuff, bricks and block.

20 Q. Do you remember any tanker trucks coming
21 in there and dumping liquids?

22 A. A long time ago. GE brought something in
23 there, two tanker trucks. I think it was blue
24 trucks or something.

25 Q. And what happened then?

1 we hauled all the steel to like, like Moskowitz and
2 them places for my brother.

3 Q. You didn't take the wrecked stuff to the
4 dump, you took it --

5 A. No.

6 Q. Where did you take it?

7 A. Just right to the scrap yards, metal
8 foundries.

9 Q. Okay. I have a couple more names of
10 companies here.

11 Valley Asphalt Corporation?

12 A. I heard of the name, is all I can say.

13 Q. Okay. John J. Whitton?

14 A. I heard of Whitton, yes. He hauled
15 there.

16 Q. Ford Motor Company?

17 A. Yes, they hauled in there I believe.

18 Q. While you were working there?

19 A. I don't know. I heard of the name, you
20 know. I think they did haul in there.

21 Q. Okay. Do you remember what that was?

22 A. I don't remember.

23 Q. Velocol?

24 A. Never heard of it.

25 Q. Dow Chemical?

BRITTON & ASSOCIATES

DAYTON - (513) 228-3370 CINCINNATI - (513) 651-3370

Elsa Skinner-Morgan Interview Excerpts

CONFIDENTIAL

SKINNER LANDFILL PRP GROUP

Interview of Mrs. Elsa Skinner-Morgan
February 10, 1993

at the law firm of
Holbrook, Jonson, Evans & Olivas
315 S. Monument Ave
Hamilton, Ohio 45012

In Attendance

For the PRP Group:	Charles R. Dyas, Jr., Esq.	(CRD)
	Robin Couch, Esq.	(RC)
	Don Sonney	(DS)
For Mrs. Skinner-Morgan:	Timothy Evans, Esq.	(TE)
	Mrs. Elsa Skinner-Morgan	(ES)
	Mr. James Morgan	(JM)

(Transcript of Tape Recorded Interview)

RECEIVED
JAN 30 1997
Legal Department

C.R.D. So what we would like to do is just ask you, of your, what you remember, what you can remember about the operations of your late husband's activities there, of John's activities there, just everything that you can remember, and we want to try to get into specifics because of our obligation to clean up the site that the government is forcing us to do, the more people and the more companies we can draw in to this, it spreads the cost out.

E.S. I understand that.

C.R.D. Now, we understand that, and we made these arrangements for this, this is informal. This is an informal conversation. You don't have to answer anything you don't want to. You're here voluntarily --

E.S. I'm glad to, really, okay.

C.R.D. And we also, uh, we appreciate it.

E.S. I have cooperated one hundred percent with the EPA too.

C.R.D. And you can stop at any time, yeah.

E.S. All the time, I was really never involved except for the billing part process, and it was a small, very small operation. I mean compared to now a days, it is nothing.

C.R.D. We'll go into everything on that.

E.S. Uh huh.

C.R.D. And we do appreciate your cooperation, and if you get tired and you want to stop, say so.

E.S. Why not, I'll tell you.

C.R.D. We, indicated to Tim that, if anything, we'll go through a couple hours today, and then maybe come back on the 16th if there is no objection to that.

E.S. I'd like to get it finished today, if you don't mind. If it's possible. If not, yes I will come back the 16th.

T.E. There may be some follow-up after that.

E.S. Uh huh, if you want to, fine.

C.R.D. And also, we'll take back what you tell us to the other members of the group, and they may have questions about things like that.

R.C. Even if she can remember some things that may trigger something else that somebody knows.

E.S. I know a few things.

R.C. which may lead us to, you know.

E.S. Yeah, I know.

C. R.D. Well, from what I've been reading is that, uh, you, uh, you married Al in 1944?

E.S. Right.

C.R.D. And then, did you live on that property at that time?

E.S. Right away, yes.

C.R.D. Right away.

E.S. I raised two step children, he had two children.

C.R.D. And who were those --

E.S. John and Otis.

C.R.D. John and Otis?

E.S. And one was six and one was nine when I married Alfred.

C.R.D. Okay.

E.S. And we did not buy the property, he had a small quarter, not even a quarter of an acre that he had built his own home on, and uh --

C.R.D. Is that the home you're in now?

E.S. No, no. He built a new one later. Uh, and uh, in '47 he and I bought, well, he bought the rest of the acreage.

C.R.D. That would have been the whole, uh, 70 --

E.S. 45 acres in one parcel, 6 acres in another from a neighbor that my son inherited, lives on now --

C.R.D. Alright.

E.S. And the 45 includes the landfill that you're talking about, and then --

R.C. And that was in '47?

E.S. Way, way later, we bought 24 and some acres across the creek from another neighbor.

C.R.D. Okay. The records and other depositions taken show that at the time you bought it, there was already a dump on the property?

E.S. Oh, yes, it was being used also.

C.R.D. Who ran that dump?

E.S. There was no running. This man allowed anybody to dump in there that he wanted to. He never charged them because he never watched it. They had to go past our drive to get up there. That's how we knew they were dumping.

C.R.D. Who was the, who did you buy that from?

E.S. I cannot think of his name, but you would find that in the courthouse.

C.R.D. Right.

E.S. I cannot think of their names, its been so long ago.

C.R.D. Okay.

E.S. Lord, I'm going to be 74 the 15th, you know. I'm lucky I remember what I did.

C.R.D. I'm going --

E.S. I was more involved with the gravel pits end of the business. I never was too involved in, it was penny anti compared to the others, you know what I mean.

R.C. Uh, hum. Most of your income was from the gravel pits.

E.S. Right. We had gravel pits that we later sold, you know, things like that.

C.R.D. We have a, a picture of the map, a drawing, that may not be the scale, but uh, you know. You just mentioned that you lived on the property, he built his first house, Al built his first house --

E.S. It was built when I married him. It was there.

C.R.D. Okay, you, in looking at this map, can you see where that house would have been located?

E.S. You know we're, right across from Maria where would that be Tim?

T.E. I'll say Maria's down the road down here.

E.S. Well, my mother-in-law moved to uh, to uh Florida with her youngest son who came out of the service after thirty years, and he, they gave us the home, not just Albert and me, but also all the children were named. Later on, they signed it over to my daughters, which Albert and I did also.

R.C. That was the first home you lived in there or -- ?

E.S. No, ma'am. The new home that we had was a five room house that my husband has built.

R.C. Okay.

E.S. And was right across --

C.R.D. This is, this is the road that comes from, here is Cincinnati-Dayton --

E.S. Yeah.

C.R.D. And this is the road that comes on, onto your property.

E.S. Jimmie would know, wouldn't you hon?

J.M. This is the driveway going down.

C.R.D. Right. This is your driveway right here.

E.S. Well you know where Marie is, and right across from there is where we live.

J.M. Maria's sits about right in here some place.

C.R.D. Okay.

J.M. In that area, right there.

E.S. And right across the roads from there, there's like a, you know, that circle that goes around, right across from there, from this home, is where we live. It wasn't even a quarter of an acre. That's all Albert owned at the time when I married him.

C.R.D. And then when you lived there, you said that the road --

E.S. That's where, it was dumping, it was always a gravel road --

C.R.D. -- ran right in front of your house?

E.S. Yeah, that passed our house, always.

C.R.D. And you saw --

E.S. Later on they made a circle out of it.

C.R.D. And you saw all the trucks?

E.S. Oh, yeah.

C.R.D. Alright. Um, when you married Albert, he was involved in a number of different businesses, right?

E.S. In sand and gravel. He had a gravel pit in Arlington Heights.

C.R.D. Okay.

E.S. Uh, he was, I guess you'd call it, a kind of a, he worked for Kingsmill Powder Company and he was kind of the head man up there. I don't know what, he didn't have a title.

C.R.D. Is that Peterson?

E.S. Both.

C.R.D. They're both the same, weren't they?

E.S. Well, they were right next door, weren't they?

T.E. Well there was two --

T.E. It was across the street from each other, there seems no Army -

E.S. There was a Kingsmill Army Depo that he was involved in the most.

T.E. Across the street was, uh, Peter's Cartridge (INAUDIBLE)

E.S. I'm sure they hauled in there too.

C.R.D. Um --

E.S. That was before (INAUDIBLE)

C.R.D. He was also involved in hauling --

E.S. The Voice Of America, he built that --

C.R.D. And construction work.

E.S. All those towers, he helped build all the --

C.R.D. Rigging?

E.S. Rigging, all the rigging work, yes.

C.R.D. So he did hauling, rigging, sand and gravel --

E.S. Right.

C.R.D. And when you say he was the main man at Kingsmills,
what --

E.S. Well, he was like a foreman. Call it a foreman now
a days, but actually, he told the men what to do.

C.R.D. What did they do at Kingsmill?

E.S. The Army ran it at that time, whatever they did,
they made powder, I guess.

R.C. Who was it that worked there?

E.S. In fact, too, buildings exploded because the men had
smoked, and he was blown sky high both times. He came home one
time with his head all bandaged, all burnt, two men died.

R.C. What time period was that?

E.S. That was in '44, he had that job before I married
him, he was building the Voice Of America and was also foreman at
Kingsmills. I call it foreman, I don't know what title he had, but
if there was anything that had to be moved or constructed, he was
the one who supervised.

C.R.D. Maintenance.

E.S. Maintenance, all that. There were a lot of people
who worked there.

C.R.D. So he was employed for Kingsmills and at the same
time, he was self employed?

E.S. Sand and gravel, you know, we dug out Arlington
Heights gravel pit, and also in West Chester, there was property.

C.R.D. This property that we're dealing with now --

E.S. That was in '47.

C.R.D. -- this was originally a sand and gravel pit, and you continued to use it as a sand and gravel pit and he bought it -

E.S. Well it had been some dug out, yes. It wasn't a designated sand and gravel pit until we bought it, you know.

C.R.D. And then he continued to use it --

E.S. And it wasn't a designated dump until we bought it (laughing), but they hauled in there all the time. Now I do know that Kingsmill's Powder Company and the reason I know the Army ran it is because when, uh, in '67 and '68, my son was in Europe in the Army. Okay, this very same captain that was a head at Kingsmills was his commanding officer. I went over to see him, to Europe, and I met him and he was so tickled to see me, he had eaten in our table already. And he was very nice to my son, you know. He didn't know that was my son until I went over there to visit him.

C.R.D. Ray was --

E.S. Ray was in the service, yeah.

C.R.D. Ray was in Europe when you visited?

E.S. European, yeah. In Germany.

C.R.D. Do you know the name of that commanding officer?

E.S. No I do not, I do not remember. That's been so long ago, '68.

C.R.D. The, um, --

E.S. He was a captain, though, I'll tell you that.

C.R.D. When you, when, um, after you had married Albert and the sons were there, did you yourself, were you just a housewife or were you involved --

E.S. No, I was also his bookkeeper.

C.R.D. -- you were his bookkeeper for all this other business?

E.S. We never hired anybody for booking, I did it all. We weren't that busy at the time either, you know. He got a check, regular check from Kingsmills. He got, he had a lump sum deal

contact putting up the towers, so I had, you know, too much billing to do. And we never billed anybody for dumping until we bought the place, so, that's when that started in '47.

C.R.D. Did you have, uh, did you have any bookkeeping education or background at all.

E.S. Well, I went to high school, and I took a business course there. I took both really.

C.R.D. So you knew how to at least do the ledgers and fill them in?

E.S. Oh, yes, he has books on it, and you're welcome to look at them and keep them as long as you need to.

C.R.D. Thank you.

E.S. As you can see, it was a minimal business at the time.

C.R.D. We, uh, we've looked at some of the documents which you let the EPA look at, and we're going to probably ask you some questions today about those documents and other things, so we'll get into it a little bit more today. You remained his bookkeeper clear through the life of the business, all his businesses?

E.S. As long as he lived, yes.

C.R.D. Okay. And as part of being the bookkeeper, you recorded the income that you would receive?

E.S. That's the reason I put it down, the only reason, the Internal Revenue purposes.

C.R.D. You set out all the bills?

E.S. Yes.

C.R.D. Okay. Did you have to collect on any of the unpaid bills?

E.S. I don't know, a lot of people still owe us to date. I just wish I had that money they owe us. I'd be on easy street (laughing). Albert didn't believe in contracts, you know, a shake of the hand, that was his way to do it until he got wise.

R.C. So you didn't have contracts --

E.S. Not too many, no.

C.R.D. Did you, uh, have files on everything?

E.S. Yes, and naturally after so many years, you dump them. I did keep these books, luckily.

C.R.D. You, you think there may be more records somewhere on the property or stored away?

E.S. No, I know there is not. No, they were destroyed.

C.R.D. Everything was destroyed, but for those ones you gave the EPA?

E.S. Right, just those books, uh hum. But those, that's where I kept the records. I, uh, the rest would have been the bills, you know, that I had sent, that's all you would have besides --

C.R.D. Did you, did Albert have any employees during any of that time period?

E.S. Oh, off and on.

C.R.D. You paid for all their social security and worker's compensation?

E.S. In those dates, they didn't have all that. Yeah, they did, they had social security. These were transients, and he only had like one at a time, so we didn't have to go through all that.

R.C. Do you have anywhere --

E.S. See my son got over, he helped him right away.

R.C. Do you have anywhere a list of the names of some of these individuals?

E.S. Honey, they're all dead. Almost all of them are dead. They were older people. Albert was 12 years older than I. And, uh, they were older than he was. No, there's hardly anybody living anymore that worked with him.

C.R.D. So your primary occupation during the period was your husband's bookkeeper --

E.S. Was housewife.

C.R.D. -- and housewife.

E.S. There wasn't that much bookkeeping is I'm trying to tell you.

C.R.D. Yeah. Did you ever go up to the actual landfill area, I mean --

E.S. Seldom.

C.R.D. Seldom?

E.S. Once in a great great while, maybe you'd call him to come home and eat, something like that.

C.R.D. All the trucks that came into the landfill would come right by either your old house or your new house, right?

E.S. Well, uh, yeah. They did. They had to past there to get there.

C.R.D. You saw a lot of the trucks.

E.S. Yes. I wasn't too terribly interested until my husband had to put him in a nursing home until he became quite ill. I had him home in diapers for two years, and then he went to the hospital with prostate trouble and they overdid it on the anesthetic, he had a stroke, and from then on, I couldn't handle it. He was in one position all the time, he couldn't move. So I had to put him in the nursing home. And then a couple of years later, I had my mother in there, so I had two of them to visit for about seven and a half years. So actually, you know, that's when I started running the landfill, that's the first I had to deal with it.

C.R.D. That was about, uh 1978 or around 80?

E.S. He lived three and a half years in a nursing home, two years before, it's five and a half, he died at the age of 84.

C.R.D. He died in '84?

E.S. No, he died in 1984, yes.

C.R.D. Right. And then the prior three, five years --

E.S. Figure it about five years prior to that.

C.R.D. Okay. During the period that Al ran his businesses and the landfill, did he determine what price to charge people?

E.S. Yeah.

C.R.D. How did he do that, do you recall?

E.S. He'd say to me, they brought a load in here, this is worth \$10.00. They brought a load in here, this is worth \$3.00, that's the way it went.

C.R.D. Did he even say what the material was?

E.S. Never mentioned what it was. It was nothing, I mean there was, you could put anything in there that you wanted to in those days.

R.C. Do you know if he had any system as far as what he charged for different materials?

E.S. Well, yes, it was a pick up truck, it would be \$3.00. If it was a great big truck, it could be \$15.00.

R.C. So it was mostly the size of the container?

E.S. Yes, square yard really, I think, you know. So many cubic yards, I mean, whatever it was on the truck.

C.R.D. Um, and he just came in, told you what to bill and gave you a name and an address?

E.S. Yeah, uh hum.

C.R.D. Did you ever end up calling people up, any of these customers, and talking to them on the phone about their bills?

E.S. Not too often, not until I took it over.

C.R.D. Okay, uh.

E.S. Albert would go see them in person, generally. Like I said, it wasn't too big of a business.

C.R.D. Yeah, hands on type of --

E.S. That was a side line. We had, sand and gravel was our main business.

C.R.D. Right. The records which you gave the EPA indicate that the loads taken out to the dump, and tell me if I'm wrong, there weren't that many every month. How many a week, loads would go into that?

E.S. Sometimes it would be a month before there would be one load.

C.R.D. And it fluctuated by the years --

E.S. Not until, well, not until two years before he became ill. That's when he allowed more in there because that, he didn't do anymore, we had sold the gravel pit in Arlington Heights and we had sold the one in Hamilton. So, after that, that was just like a hobby to him, but we didn't make a whole lot of money on it.

C.R.D. So a load would be --

E.S. Until I took over and let Kings dump in there.

C.R.D. Yeah --

E.S. And Whitten, and these big outfits, we didn't make any money in there. If we made \$3,000 a year, we did well.

C.R.D. That's what your books show, that the loads were not frequent --

E.S. Well, its accurate, because I've been audited just about every year, small business --

C.R.D. Once a month and maybe a couple loads a month and then it picked up in late '60s, but when you first --

E.S. There'd be little stuff like a dollar, three dollars, two dollars.

C.R.D. These were the only set of books that you have for this operation?

E.S. Right.

C.R.D. Okay. Did you have any just straight cash transactions?

E.S. That I wouldn't know, he took care of that. Yes, he would tell me when he got cash. Yes, I put it down too. It wasn't that much.

C.R.D. Uh.

R.C. If you got cash, would you record who it came from or just like a cash?

E.S. No, I put, uh, uh miscellaneous income down, and I'd maybe, it would amount to \$500, maybe \$200, maybe \$50.00. I didn't know, whatever --

R.C. Alright.

E.S. -- But you'll notice in these books, there's miscellaneous on there all the time.

R.C. Yeah. But he wouldn't necessarily tell you who it was, he would just say \$20.00, I got \$5.00 --

E.S. Yes.

C.R.D. The, uh, Albert became pretty ill there and he could not operate the landfill and John took over, right?

E.S. Well he took over to the extent where he would put the dirt over it, that's all. You know what I mean, he would cover it up.

C.R.D. Who would set up the customers?

E.S. I did.

C.R.D. That was --

E.S. Yeah. I did that --

C.R.D. So, John didn't --

E.S. I did that over the phone or they came to my home and said, can we start hauling in there and how much it was?

C.R.D. Uh hum. And John didn't get involved in that part of it --

E.S. Only, cleaning it up --

C.R.D. -- physical work?

E.S. He was up there many of time when, um, somebody was always up there when they dump, one of the men, and later on my son had to get out of the service --

C.R.D. Ray

E.S. He did that for me. He never charged me a dime, years.

C.R.D. John had, was in other business as well, right?

E.S. Oh, sure, he had his own business, that's why I say at night he would cover that up, that's all, or before he left for work. Yeah, he did hauling.

C.R.D. He had the trucking part --

E.S. Interstate hauling, yes. He had his own business.

C.R.D. So when, you took over the business when Albert was too ill to do it any longer?

E.S. That was all demolition.

C.R.D. That was, all demolition. And that was in the late 70s and then up to when the state closed down in '90?

E.S. Five and a half years prior to '84, you'd have to figure it up, that's when I did it. Those five years.

R.C. Uh, huh.

C.R.D. How did you determine prices during that, well, this was?

E.S. They would tell me what they paid other companies, and I'd take their word for it. And my son knew, I mean, heck, they weren't stupid, you know, they got around.

R.C. Uh, huh.

C.R.D. You operated or did you operate, accept waste in there clear to 1990?

E.S. Well when the, when did they make me stop?

C.R.D. That was July 1990.

E.S. Yes, uh huh.

T.E. Prior to that, '78 though is when they put out an order they couldn't take any --

E.S. Yeah, right.

T.E. Not anything other than demolition, '78 and that's -

R.C. Right, but you were taking demolition up until 1990?

E.S. Uh, huh, up until then.

C.R.D. Okay. Um, let's see here, a couple, the question that I had, do you remember a gentleman from California who was going to work with Albert in operating that landfill, a guy by the name of George Soloman?

E.S. Yeah, sure did.

C.R.D. Tell us what you remember about George Solomon, and what was his involvement?

E.S. Uh, his involvement, there was no involvement. They, we had decided, yes, that he could come in there and operate it and we would get so much from it. He had to have his own help, everything. But then we found out that he was a scam artist and that he had done this in different states, so we dissolved the contract somewhere, I think we had you on it, didn't we?

T.E. I think so, for a couple years.

E.S. But it was you or Holbrook(INAUDIBLE).

T.E. I know the office did it, I don't (INAUDIBLE).

E.S. Anyhow, he was, we knew he was a known crook. We found out, put it that way.

C.R.D. He never got, let him get involved with the company?

E.S. No, not one time. You know. All he ever stepped on the property for was to discuss it. We did sign though, but we cancelled it, quick.

C.R.D. I saw his name pop up.

E.S. He was glad to cancel after we found out what he could have done.

C.R.D. Okay, um, when Ray came back from the Army, he actually just helped out on the site?

E.S. Oh, he worked for the railroad, he, that was his main job.

C.R.D. But he would do like John was doing, he would come in --

E.S. He'd cover for me.

C.R.D. -- and cover it up everyday.

E.S. In fact, John did it till he died and he died in an accident right on the property in '82?

R.C. What kind of an accident, can you explain a little bit of what the accident was from?

E.S. Yeah, he was building a place to put a trailer, he had just gotten married for five weeks. He was going up, he had

e had to go through a creek and go up a hill and the hillside was, um, wet --

T.E. He was on a loader (INAUDIBLE) --

E.S. -- yeah, he was on a rubber tire loader and he hadn't put the cross bars on, you know what I mean, and he told my son, our son, Ray, to stay off of it, that he'd get killed on it because he didn't know how to run it because he didn't have that on there. And he himself slipped and crushed his skull. He died two years before my husband. And that was a low moment, and after that my son, now that was in '82 then, that my son started, all he did up there was cover it also.

C.R.D. Do you remember back in the late 50s, the municipalities, cities, towns, bringing their material out to the site?

E.S. Yes.

C.R.D. And those were, um, that was just trash, garbage?

E.S. Mason, some from Sharonville, all these little towns, hell yes.

C.R.D. Why did, do you know why they stopped bringing stuff out there?

E.S. No, we were more involved with sand and gravel, and we just weren't there.

C.R.D. And they needed someone who was in this business full time --

E.S. They wanted a big place. We, and you can see, there's only about one and a half acres that was actually used, and that includes what you they call the lagoon. They call the lagoon. Its a place up there, maybe half acre that, uh, had so much rain one year, there must have been some oil there. Of course, we had equipment of our own, we greased it, we oiled it up and everything. So there was bound to be oil up there, so there was a little oil film on top. Anyway it rained so heavily that year that the water was standing like this so they called it a lagoon. That's there only version of a lagoon. You don't see a lagoon now, you won't until we have a flood. See what I mean.

C.R.D. Right.

E.S. Well that lagoon area was, it wasn't even a half acre, would you say it was a half acre?

J.M. Approximately, yes.

E.S. And the rest would be an acre. One-half acre was all that was ever used up there. It's up on a mound, great big high hill. You know, aside from all the other ground.

R.C. That will help in making it look like a ordinary (INAUDIBLE).

E.S. Sure, because it had been dug out, that had been dug out for gravel. And we had barrels standing all around, and they were empty barrels. They kept saying there were full. Nobody ever looked in those barrels. We know they were empty because we sold them to, um, is it American or the Barrel and Drum Company in Cincinnati. Cincinnati Barrel and Drum Company. When we had a whole load of them, you know, come in, we'd sell them.

R.C. Where did you get the drums from?

E.S. Well, people would bring them in there, get rid of them, companies.

R.C. (INAUDIBLE)?

E.S. They were empty. Cause we used some of them for, you know, to put our garbage and that or waste, I still have one up there. Yeah, well, they, uh, they took a lot for granted. They read into it what they wanted to.

C.R.D. Well they got us into it now full time.

E.S. Yeah boy.

C.R.D. And as Tim's probably told you, the work they want done out there is estimated about \$30,000,000, and no one's too happy about that.

T.E. Well, I saw the estimate, its about eleven or twelve, and the highest is eighty-eight million.

E.S. Good grief.

R.C. And then of course, this doesn't include everything that will end up, EPA assessments?

E.S. All the monitoring all these years, too.

C.R.D. Realizing too that the work on the property will restrict the use of this property?

E.S. Oh, yes, they say 15 acres.

C.R.D. They say more than that, they're saying 28 acres.

E.S. Well why, when its only one and a half acres that we used?

C.R.D. Well from what we understand is that the --

E.S. Seepage --

C.R.D. No, well, part of that, the landfilling operation itself is about 15 acres, and where the, what they're calling the lagoon is about 15 acres. But, what they're doing, they're requiring us to put a, no the total is 15 acres, so the lagoon is about an acre and a half. But they're requiring to put a cap, and a cap, its going to be a hazardous waste cap which is going to consist of layers of sand, gravel, a plastic liner, more gravel, more sand, soil and then grass. And then it will have to be sloped and tapered off on all edges so that water will run off of it so that no water goes down into the area. So that's why they've expanded this.

E.S. Yes, I can understand that.

C.R.D. And then, so the fencing will be around that whole area. So it's going to take that much of your property and then no use of that property for the future, from now until whenever they decide, its shut off.

T.E. Unfortunately, that's the back end of the property, probably the least usable, because all of this up in here --

E.S. Does that go up into the 25 acres that we bought across the creek?

T.E. No, it doesn't cross the creek at all?

E.S. Okay.

C.R.D. So you know, you'll have to talk to Tim about what the EPA expects from you as the property owner for the future use of the property because they will, we're just doing the work at their orders, and then once the work is completed, we turn it back over to you as the owner, and then the EPA is going to tell you that can't be used, that can't be touched. You can't dig.

E.S. I don't think anybody would want it, do you?

C.R.D. They won't allow any digging, building, anything on it --

E.S. Oh, I realize that (INAUDIBLE), so it's useless. So I'm paying taxes for nothing, right?

T.E. We might be able to give it to the US EPA.

C.R.D. They won't take it, we've tried it.

E.S. I'm going to will it to 'em. Can they refuse it.

C.R.D. I don't know, that would be good.

T.E. There's not a whole lot you can use that for anyway,
as (INAUDIBLE) as it is, it can't be far.

E.S. It's one big hill.

T.E. It can't be farmed and its not tillable. And to
develop it, you'd have to put (INAUDIBLE)

E.S. No, I wouldn't.

C.R.D. Now, Ms. Morgan, we realize that you've gone through
a lot of these same questions over and over again for the past,
over ten years now, and everybody's asked about specific companies.
Well for us to do our job, we've got to ask you about specific
companies again.

E.S. Fine.

C.R.D. What we want you to do is we ask you about a
company, tell us what you can remember, if they dumped at the site,
how often they dumped at the site. Can you identify, can you
remember what a truck looked like, can you remember names of any of
the drivers, can you remember talking to any of their people on the
phone for their bills, anything you can remember is what we would
be looking for. We noticed when you talked to the EPA, they pretty
much skimmed over it and said well do you know about this company,
and you said yes or no, and then when you said yes, they just went
on to the next one, they didn't ask you, well, what did you know.

E.S. They didn't seem to want to know about the Army.

C.R.D. So we want to --

R.C. You remember, you think you remember an employee
name or something, you know --

E.S. No. All I can say is there was a captain there that
would know where they had the barracks and everything, that --

R.C. Even any of the truck drivers from any of these
companies --

E.S. Honey, I don't know.

R.C. -- a lot of times, if they hear a name and they realize they have an employee, maybe not with that name, but a name similar to it?

E.S. No, dear, I don't. See, I wasn't that involved with it.

R.C. And we didn't know if maybe, when they bring, brought the tickets to you, if you happened to see the same person and you knew this was Jim because you'd seen him a dozen times?

E.S. No, I would never see them, no.

C.R.D. We do realize that you've gone through this before and again --

E.S. Well I don't mind. That's quite alright.

C.R.D. -- and we appreciate your help. Um, Don here has his work cut out for him because he is the one who's going to go out and he gets to start knocking on doors, talking to people and everything, you can provide him to help him from running around in circles --

E.S. I know the Army put stuff in there. When we bought it, I know, that the one, what'd you called --

C.R.D. Peter's did.

E.S. Peter's did, I know for a fact, and that was before I was involved because I saw them go by there all the time, before we owned it, I know for a fact Kingsmills Powder Company dumped in there. What they dumped in there, I don't know, nobody ever told me. Nobody said. But they didn't pay either. Cause we didn't own it.

C.R.D. Right, did they --

E.S. Didn't pay us I should say.

C.R.D. Speaking of that specific company, do you remember when --

E.S. Now the people --

C.R.D. -- when you bought that --

E.S. -- is long dead, they're long dead.

C.R.D. Oh, when you bought the property, did Kingsmills keep bringing stuff in?

E.S. Yeah.

C.R.D. And you charged them?

E.S. Uh, Kingsmills brought in there, I think, uh, they paid, I guess, Albert so much of a salary and I believe they added that to it. I never had to bill them, you know. Or he let them dump it in there, I don't know.

C.R.D. Uh, for clarification purposes, to help us understand your records, this is, these are copies of just the ledger sheets for your billing?

E.S. Uh hum, that's all I had.

C.R.D. Okay, we have a question. From 19, on the top of all these, you wrote "income from dumping and landfill disposal plant", alright. In 1969 through the last one we have here is '76, '77 and '78, its income on trucking, hauling and etc.

E.S. Well that was my husband with, uh, that was sand and gravel.

C.R.D. But you didn't have any, that's what we thought this was, that would be sand and gravel. So you didn't have any records for that dumping from '69 to the present.

E.S. Then there wasn't any, that much. Sure those are the years when we ran the sand and gravel plant, we didn't bother.

C.R.D. Alright. Uh, I'm going to, uh, let Don ask you specific questions on the specific companies and thoughts he may have and then --

E.S. Well Don, I know one other that hauled in there, that's Mecco Incorporated in Middletown. They seemed to ignore that, but I know for a fact they did.

D.S. What did they haul, do you know, or what did it consist of?

E.S. I don't know what was in it.

T.E. It's junk, scrap --

E.S. Junk, scrap and that --

D.S. Okay.

E.S. But, I think there were some barrels too, oil.